

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

In the Matter of)	
)	CC Docket No. 94-1
Price Cap Performance Review)	
for Local Exchange Carriers)	
)	
Treatment of Operator Services)	CC Docket No. 93-124
Under Price Cap Regulation)	
)	
Revisions for Price Cap Rules for AT&T)	CC Docket No. 93-197

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**BELL ATLANTIC¹ RESPONSE TO AD HOC AND USTA
MOTIONS FOR EXTENSIONS OF TIME**

Ad Hoc² asks the Commission to extend the dates on the comment cycle for the Commission's restructure of price cap and new service rules.³ Ad Hoc's principle argument is correct -- given the number and complexity of issues raised by the Commission, all parties are better served by additional time to respond.⁴ As recognized in the USTA motion however,⁵ Ad Hoc's additional arguments concerning the other principal price cap proceeding are wrong.

¹ The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; and Bell Atlantic-West Virginia, Inc.

² Ad Hoc Telecommunications Users Committee Motion for Extension of Time (filed October 31, 1995) ("Ad Hoc Motion").

³ Second Further Notice of Proposed Rulemaking in CC Docket No. 94-1, Further Notice of Proposed Rulemaking in CC Docket No. 93-124, and Second Further Notice of Proposed Rulemaking in CC Docket No. 93-197, FCC 95-393 (rel. Sept. 20, 1995) ("Reform NPRM").

⁴ Ad Hoc Motion at 2-3.

Contrary to Ad Hoc's suggestion, the same logic also applies to the Commission's consideration of the permanent rules for price cap financial calculations.⁶ Like the Reform NPRM, the Financial NPRM seeks detailed information concerning "complex and very important issues."⁷ Indeed, while the ultimate framework for calculating a rolling average total factor productivity offset can be made simple and selfworking, the issues leading to the establishment of that offset involve complex economic theory.⁸ Indeed, the Financial NPRM includes more than 250 separate questions or information requests.

Granting extensions in both proceedings also serves the interests of coordinating responses to the interrelated issues involved.⁹ A decision on price cap methodology is inextricably linked to what services remain in price caps and what rules those services will operate under. Moreover, specific issues, such as the question of multiple "X" factors, are directly raised in both proceedings.¹⁰

For the foregoing reasons, the Commission should grant a limited extension to the comment rounds of both the Financial and Reform price cap rulemakings.

⁵ Opposition to the Motion for Extension of Time of Ad Hoc Telecommunications Users Committee and Motion for Extension of Time of the United States Telephone Association (filed Nov. 8, 1995) ("USTA Motion").

⁶ Fourth Further Notice of Proposed Rulemaking, FCC 95-406 (rel. Sept. 27, 1995) ("Financial NPRM").

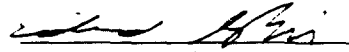
⁷ Ad Hoc Motion at 2.

⁸ See USTA Motion at 4.

⁹ The tandem postponement need not be as lengthy as suggested by Ad Hoc. USTA calls for as little as three weeks, although the Commission may wish to defer the initial comment rounds longer to avoid future requests for additional delay.

¹⁰ Reform NPRM at ¶¶ 159-62; Financial NPRM at ¶¶ 108-11.

Respectfully submitted,



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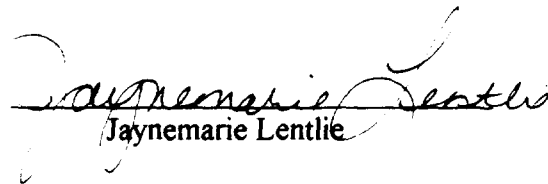
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November 9, 1995

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Bell Atlantic Response to Ad Hoc and USTA Motions" was served this 9th day of November, 1995 by first class mail, postage prepaid, on the parties on the attached list.


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